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5. The Center has only two other non-clinical full-time staff members, and they likewise do not have the capacity to respond to the Defendants' discovery requests and prepare for trial in Ms. Denison's absence.

6. Ms. Denison's personal crises and her absence from the center will make it impossible for the Center to continue in the case as a party and presents a reasonable rationale for the Center's dismissal from the case.

7. There are currently no dispositive motions pending in the case.

8. The Defendants will suffer no prejudice from the Center's withdrawal from the case. The case will continue with the other plaintiffs, who all seek a common remedy (and one of whom operates the other abortion clinic in Knoxville), and will not suffer from the Center's departure.

9. The Center is not responsible for any delay, nor has exhibited any lack of diligence, in the six months in which it has been a party in the case.

Wherefore, Plaintiff Knoxville Center for Reproductive Health, Inc. prays that this court grant its Motion to Dismiss its Claims Without Prejudice and for such other and further relief as the court deems just and proper

Respectfully submitted,

/s/ Thomas H. Castelli
Thomas H. Castelli #24849
American Civil Liberties Union
Foundation of Tennessee
P. O. Box 120160
Nashville, TN 37212
Tel: (615) 320-7142
Fax: (615)-691-7219
tcastelli@aclu-tn.org

Julia Kaye (admitted *Pro Hac Vice*)
American Civil Liberties Union Foundation
125 Broad St., Floor 18
New York, NY 10004
Tel: (212) 284-7358
jkaye@aclu.org

Attorneys for Plaintiff
Knoxville Center for Reproductive Health

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Motion to Dismiss Without Prejudice* has been served on the following counsel of record through the Electronic Filing System on this 15th day of February, 2018:

Alexander Stuart Rieger
Steven Ashley Hart
Sue A. Sheldon
Tennessee Attorney General's Office
P O Box 20207
Nashville, TN 37202-0207
(615) 741-2408
Fax: (615) 532-5683
alex.rieger@ag.tn.gov
steve.hart@ag.tn.gov
Sue.Sheldon@ag.tn.gov

/s/ Thomas H. Castelli
Thomas H. Castelli